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Date: 3-8-04


Himanshu S. Amin

OFFICIAL

3/16/04

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:

Applicant(s): David S. Wehrle, *et al.*

Examiner: Rehana Perveen

Serial No: 09/546,089

Art Unit: 2182

Filing Date: April 10, 2000

Title: POINTBUS ARCHITECTURE AND AUTOMATIC SEQUENTIAL ADDRESSING

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

REPLY BRIEF

Dear Sir:

Applicants' representative submits this reply brief in response to the Examiner's
Answer mailed January 9, 2004.

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- i. *The Zegelin patent fails to teach or suggest a first protocol to enable the at least one I/O module to receive the network communications.*

In the Examiner's Answer, the Examiner contended:

Zegelin clearly teaches a first protocol to enable the at least one I/O module to receive the network communications (col. 4 line 18 – col. 5 line 32). While in the standard communications protocol mode, Zegelin utilizes the standard communications protocol, control signals as a part of the currently active communications protocol mode, to select another communications protocol (col. 4 lines 18-52). Zegelin's selection process for the changed communications protocol clearly cannot be accomplished without the standard and currently active communications protocol and also the control signals as stated in col. 4 lines 31-41 of Zegelin.

Applicants disagree. Zegelin discloses computer peripherals that are capable of communicating via a number of different protocols. (See col. 1, ln. 53-58). A control signal is utilized to select a particular communications protocol. (See col. 2, ln. 30-40). The control signal switches between communications protocols by providing illegal or nonsensical signals. For example, for the PCMCIA communications protocol, setting both OEI and WEI (pins 9 and 15) low, which is illegal, causes switching to another communications protocol. However, this illegal control signal is not a *protocol* as defined by the subject application; instead, the illegal control signal is a high or low voltage signal.

On the contrary, the subject application describes an exemplary protocol to enable the at least one I/O module. A protocol, as defined by Merriam-Webster Dictionary, is "a set of conventions governing the treatment and especially the formatting of data in an electronic communications system." The subject invention describes an exemplary protocol to enable the at least one I/O module to receive the network communications. For example, at startup, each I/O module sets its output high and each I/O module waits until its input pin level changes to low. A first DupMAC message is transmitted, and then the module sets its output low. A packet comprising a sync bit, size bit, command, data, and CRC may be transmitted over the output pin. The sync bit signals to neighboring modules that a command is being transmitted. The size bit indicates the

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packet length. The command issued and the command specific data can additionally be included in the packet. Furthermore, the CRC is the inverse of the remainder of the 12-bit quantity of the size bit, command and data fields divided by 8. (See pg. 20). Thus, Zegelin fails to teach or suggest a protocol to enable the at least one I/O module to receive the network communications as recited in the subject claims.

CONCLUSION

For at least the above reasons, the claims currently under consideration are believed to be patentable over the cited references. Accordingly, it is respectfully requested that the rejections of claims 4-12 be reversed.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Respectfully submitted,
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